

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

GLENN D. GORRELL,
ROBIN J. GORRELL,

Debtor(s)

DEERE & COMPANY D/B/A JOHN DEERE
FINANCIAL

Plaintiff(s)/Movant(s)

vs.

GLENN D. GORRELL,
ROBIN J. GORRELL,, and
WILLIAM G. SCHWAB, Chapter 1s Trustee,

Defendant(s)/Respondent(s)

CHAPTER 12

CASE NO. 5 - 18 .bk- 05276-RNO

ADVERSARY NO. - ap-
(if applicable)

Nature of Proceeding: Hearing

Motion for Adequate Protection

Document #: 37

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The parties have begun discussing a possible resolution to the Motion and would like to request a continuance of the hearing scheduled for September 5, 2019 to allow additional time for a possible resolution. This is a first request.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: August 30, 2019

/s/ Lara S. Martin

Attorney for Deere & Company d/b/a John Deere F

Name: Lara S. Martin

Phone Number: 412-456-8102

¹ No alterations or interlineations of this document are permitted.